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We recommend that the California Air Resources Board:

- Undertake and adopt regulatory measures that require recycling of waste gases at refineries instead of dumping and incinerating them
- Adopt regulatory measures to eliminate the methane exemptions granted to refineries and require methane control measures at refineries
- Identify and implement energy efficiency measures at refineries that include, but are not limited to, conducting an energy audit. This audit shall consider and address, at least:
 - Use of clean, renewable energy for refinery electricity consumption
 - The impact of heavier crude oil modifications in GHG emissions
 - Other energy efficiency measures

As discrete Early Action greenhouse gas emission reduction measures that can be implemented pursuant to Health and Safety Code section 38560.5.

These are 29-31 on the ARB Environmental Justice Advisory Committee recommended list of Early Action Measures.

We also support the other Early Action Measures that the Environmental Justice Advisory Committee has endorsed.

Sincerely,
Communities for a Better Environment